

# **Exhibit 6**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD BRIGGS;  
RAJ LEE; MICHAEL CAMERON; MATTHEW  
SAUNDERS, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his official capacity  
as Sheriff of Oakland County; CURTIS D.  
CHILDS, in his official capacity as Commander of  
Corrective Services; OAKLAND COUNTY,  
MICHIGAN,

Defendants.

Case No. 20-cv-10949

**DECLARATION OF STEVEN LEE JOHNSON**

I, Steven Lee Johnson, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

1. I am currently detained in the Oakland County Jail and have been here since August 2019.
2. I am currently housed in a single cell in the D-pod. There are other people housed in the other D-pod cells and we have shared spaced in the pod's common area that we access during the periods of time when we are outside our cells. That space has a phone and shower that we all share. The phone and showers are not cleaned between uses. The shower is cleaned at most once a day by trustees and we don't have supplies to clean it ourselves. The only way to clean the phone is to wipe it down with DMQ, but that only works

when the trustees bring DMQ by, so it is impossible to clean between each use.

3. About two weeks ago, a guy named 'Treale in cell D3, right next to me, reported that he had a sore throat, runny nose, and cough. I heard him make this report. He was tested for coronavirus at that time, but was not moved out of his cell.
4. I think it was three days later a nurse came back and tested 'Treale again. After testing him they took him out of the cell and told me I was on lockdown.
5. I was not tested for COVID-19 at the time though. In fact, I was not tested for another nine days, so by the time they tested me, I could have become infected or have gotten better so that my test would not show positive.
6. The nurses in here do not wear masks most of the time. They bring me medicine every day, and I am forced to take my medicine from unmasked nurses.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

November 20, 2020

/s/Steven Johnson  
Steven Johnson

\*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On November 20, 2020, I personally spoke with Steven Johnson and read this declaration to him. Mr. Johnson told me that the information in the above declaration is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Philip Mayor  
Philip Mayor